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5 **IN THE UNITED STATES DISTRICT COURT**
6 **WESTERN DISTRICT OF WASHINGTON**
7 **AT SEATTLE**

8 **JOSHUA BROTHERS, as Litigation**
9 **Guardian Ad-Litem for REYMON**
10 **LEAVELL, a single individual,**

11 **Plaintiff,**
12 **v.**

13 **ESTEBAN MONREAL, SCOTT**
14 **LAPIERRE, BENJAMIN TIMBS,**
15 **MOLLY ACCOMANDO, FRANKLIN**
16 **POBLOCKI, JONATHAN GOODWIN,**
17 **WALKER DICKSON, AND CITY OF**
18 **SEATTLE, a lawful municipal**
19 **corporation in the State of Washington,**
20 **JOHN DOES ONE THROUGH THREE,**

21 **Defendants.**

NO. C21-1461-RSL

STIPULATION AND ORDER FOR
EXTENSION OF CASE SCHEDULE
DEADLINES

16 **1. STIPULATION**

17 COME NOW the parties by and through their counsel of record and stipulate to
18 continuance of case scheduling deadlines, specifically, Expert Witness Reports (FRCP 26(a)(2));
19 Discovery Cutoff; and Dispositive Motion Filing Deadline. The parties request the extension of
20 those deadlines for the following reasons.

21 **STIPULATION AND ORDER FOR**
EXTENSION OF CASE SHCEDULE DEADLINES
(2:21-cv-01461-RSL) - 1

Jay H. Krulewitch
Attorney at Law
P.O. Box 33546
Seattle, WA 33546
Phone: (206) 233-0828
Fax: (206) 628-0794

2. FACTUAL BASIS FOR THE EXTENSION OF CASE SCHEDULE DEADLINES

This Section 1983 civil rights case arises out of Plaintiff's encounter with Defendant police officers in the course of the police response to an anonymous 911 call reporting the presence of an armed, suicidal male at a Seattle public library. Plaintiff, who is represented herein by a Guardian Ad Litem due to having developmental disabilities, asserts claims for unreasonable seizure, excessive force, and negligence against the Defendant Officers and the City of Seattle.

The parties are in the process of scheduling depositions of various FRCP 30(b)(6) witnesses.

Presently, the expert disclosure deadline is set for September 7, 2022 and the discovery cut-off date is set for November 16, 2022. Given the substantial issues involved, the amount of discovery that still remains to be conducted, the need for one or more experts to work with the Plaintiff, and the collection of various medical records, police investigation records, and other related tasks to be accomplished, the parties are hereby requesting that the case deadlines be continued as set forth below. The parties have served each other with interrogatories and requests for production and those answers and responses are presently outstanding. Plaintiff expects to need additional time to help the Plaintiff draft answers and responses to the Defense Discovery Request given the developmental disability issues which the Plaintiff suffers from.

Given that the discovery cut-off date is rapidly approaching and so much discovery remains to be completed on this matter, including the taking of various depositions by both sides, obtaining expert reports, and other tasks, good cause exists to extend the requested deadlines.

1 This is the parties' first request for an extension of the case scheduling deadlines. The parties
2 shall comply with all other aspects of the Court's pretrial scheduling order.

3 Thus, in sum, the parties are in agreement that the following case schedule deadlines
4 should be continued as follows:

5 **Reports from Expert Witnesses under FRCP 26(a)(2) due:** Reschedule from 9/7/22 to
6 11/14/22;

7 **Discovery Completed By:** Reschedule from 11/6/22 to 12/7/22; and

8 **Dispositive Motion Filing Deadline:** Reschedule from 12/6/22 to 12/20/22.

9 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

10 DATED this 3rd day of August, 2022.

11 JAY H. KRULEWITCH, ATTORNEY AT LAW

12 By s/Jay H. Krulewitch
13 Jay H. Krulewitch, WSBA No.17612
Attorney for Plaintiffs

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20 ANN DAVISON
Seattle City Attorney

21 **STIPULATION AND ORDER FOR
EXTENSION OF CASE SHCEDULE DEADLINES**
(2:21-cv-01461-RSL) - 3

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Attorney at Law
P.O. Box 33546
Seattle, WA 33546
Phone: (206) 233-0828
Fax: (206) 628-0794

/s/ Rebecca Widen


Rebecca S. Widen, WSBA# 57339
 Assistant City Attorney
 Seattle City Attorney's Office
 701 Fifth Avenue, Suite 2050
 Seattle, WA 98104
 Phone: (206) 684-8200
 E-Mail: Rebecca.widen@seattle.gov
*Attorneys for Defendants City of Seattle,
 Esteban Monreal, Scott LaPierre,
 Benjamin Timbs, Molly Accomando,
 Franklin Poblocki, Jonathan Goodwin
 and Walker Dickson*

ORDER

Based upon the foregoing Stipulation, IT IS HEREBY ORDERED that the case schedule shall be amended as follows:

Event	Prior Date	Amended Date
Reports from Expert Witnesses under Fed. R. Civ. P. 26(a)(2)	September 7, 2022	November 14, 2022
Discovery completed by	November 6, 2022	December 7, 2022
Dispositive motions filed by (see LCR 7(d))	December 6, 2022	December 20, 2022

Dated this 4th day of August, 2022.



Robert S. Lasnik
 United States District Judge

**STIPULATION AND ORDER FOR
 EXTENSION OF CASE SHCEDULE DEADLINES**
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 Seattle, WA 98104
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